

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA \*

\*

v.

\*

Criminal No. WDQ-12-0265

\*

JOSEPH OSIOMWAN

\*

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MOTION FOR REVIEW OF DETENTION ORDER

Now comes Joseph Osiomwan, Defendant, by and through Jack B. Rubin, Esquire, and Rubin & Owens, P.A., his attorneys, and, pursuant to 18 U.S.C. Section 3145(b), hereby respectfully requests review of the detention order currently in effect in the above-captioned matter. The grounds in support of this motion are set forth below.

1. Defendant is charged in the above-captioned matter with conspiracy to distribute and possess with intent to distribute one kilogram or more of heroin, in violation of 21 U.S.C. Section 841(a)(1), as well as possession with intent to distribute heroin, in violation of 21 U.S.C. Section 841(a)(1).

2. On May 8, 2012, United States Magistrate Judge Stephanie A. Gallagher signed an Order of Detention in the above-captioned matter, noting therein the agreement of the parties to detention without prejudice to Defendant's right to request a prompt review hearing.

3. 18 U.S.C. Section 3145(b) provides in relevant part that a person ordered detained by a magistrate judge may file a motion for revocation or amendment of the order.

4. Defendant hereby invokes 18 U.S.C. Section 3145(b), and respectfully requests a prompt hearing to seek his release from detention, for reasons to be articulated at said hearing.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
JACK B. RUBIN  
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Suite 1300  
Baltimore, Maryland 21202  
(410) 727-8710  
Attorneys for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4<sup>th</sup> day of February 2013, a copy of the foregoing Motion for Review of Detention Order was served via the court's electronic filing system upon James Wallner, Esquire, Assistant United States Attorney, 36 S. Charles Street, 4<sup>th</sup> Floor, Baltimore, Maryland 21201.

\_\_\_\_\_/s/\_\_\_\_\_  
JACK B. RUBIN

REQUEST FOR HEARING

Defendant respectfully requests a prompt hearing on this Motion.